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EXHIBIT

20

21-cv-00260-PB

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SECURITIES AND EXCHANGE) Civil Action No.
COMMISSION,) 1:21-cv-00260-PB
)
Plaintiff,)
) VOLUME 1
vs.) (Pages 1 to 244)
)
LBRY, INC.,)
)
Defendant.)
)

CONFIDENTIAL VIDEOTAPED 30(b)(6)
DEPOSITION OF LBRY, INC., BY
JEREMY KAUFFMAN
1155 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK
FRIDAY, APRIL 1, 2022

REPORTED BY:
ELBIA BAIREZ
JOB NO. 220401LHR

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09:19 1 ShapeShift in connection with the sale of LBRY
2 credits to ShapeShift?

3 MR. MILLER: Objection. This is a
4 30(b)(6) deposition. It's not a deposition of
09:19 5 Mr. Kauffman.

6 A. I don't know.

7 Q. What, if anything, did Mr. Finger
8 communicate to ShapeShift in connection with a
9 sale of LBRY credits?

09:19 10 A. I don't know.

11 Q. What, if anything, did Mr. Finger
12 communicate to ShapeShift in connection with a
13 sale of LBRY credits?

14 A. I don't know.

09:19 15 Q. What, if anything, did ShapeShift
16 communicate to LBRY in connection with a sale of
17 LBRY credits?

18 A. I don't know.

19 Q. Was there any written purchase
09:20 20 agreement in connection with the sale of LBRY
21 credits to ShapeShift?

22 A. I don't believe there was more than
23 some e-mail communications.

24 Q. Were there any restrictions placed

09:20 25 upon ShapeShift and what it could do with the

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09:20 1 LBRY credits that were sold to it?

2 A. Our understanding was that ShapeShift
3 would be passing those credits onto users of
4 ShapeShift.

09:20 5 Q. Was ShapeShift obligated to inform
6 LBRY who the purchasers of the LBRY credits
7 were?

8 A. No.

9 Q. Was ShapeShift obligated to charge a
09:20 10 certain -- set a certain price for the LBRY
11 credits of its sales to third parties?

12 A. No.

13 Q. What, if anything, did LBRY do to
14 ensure that ShapeShift sold the credits to third
09:20 15 parties through its application?

16 MR. MILLER: Objection.

17 A. Could you repeat the question?

18 Q. Sure.

19 What, if anything, did LBRY do to
09:21 20 validate that ShapeShift used the credits in its
21 application to transfer them to third parties?

22 MR. MILLER: Objection.

23 A. I don't recall.

24 Q. Just to make sure, you don't recall
09:21 25 what, if anything, LBRY did or LBRY did not do

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09:22 1 Q. How -- through what medium was LBRY
2 able to access ShapeShift's application?

3 A. I believe over the internet.

4 Q. Was it a web-based portal that
09:22 5 ShapeShift was operating at the time?

6 A. Yes.

7 Q. What volumes of exchange of LBRY
8 credits did LBRY observe on ShapeShift's
9 application, if any?

09:23 10 A. We didn't.

11 Q. Does LBRY have any understanding of
12 what ShapeShift did, in fact, do with the
13 hundred thousand -- sorry. Strike that.

14 How many of LBRY credits did LBRY

09:23 15 sell to ShapeShift?

16 A. 100,000.

17 Q. What information does LBRY have of
18 what ShapeShift did, in fact, do with those
19 100,000 LBRY credits?

09:23 20 MR. MILLER: Objection.

21 A. We believe that they made them
22 available via their application.

23 Q. Beyond making them available, what
24 information does LBRY have about what ShapeShift
09:23 25 did with those 100,000 credits?

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09:23 1 MR. MILLER: Objection.

2 A. None.

3 Q. Is there any written representation
4 by ShapeShift as to what they would do with the
09:24 5 100,000 LBRY credits they bought from LBRY?

6 A. I don't know.

7 Q. Did LBRY track how the LBC sold to
8 ShapeShift was used by reading the blockchain
9 data?

09:24 10 A. No.

11 Q. Could LBRY have done that?

12 MR. MILLER: Objection.

13 A. I don't know.

14 Q. What was the source of the LBRY
09:24 15 credits that LBRY sold to ShapeShift?

16 MR. MILLER: Objection.

17 A. Those credits came from the company's
18 LBRY credits holdings.

19 Q. Is there a term that LBRY used for
09:24 20 its LBRY credits holdings in 2016?

21 A. We sometimes may have referred to
22 them as a premine.

23 Q. How big was the premine?

24 A. 400 million credits.

09:25 25 Q. And are those 400 million credits

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10:23 1 taken.)

2 VIDEOGRAPHER: Back on the record,

3 10:35.

4 BY MR. MOORES:

10:35 5 Q. Mr. Kauffman, I would like to talk

6 about offers and sale of LBC by LBRY to LBRY

7 employees.

8 Was there a program by which LBRY

9 sold LBC to LBRY employees?

10:35 10 A. Yes.

11 Q. All right. Would you please describe

12 that program.

13 A. It was a program that allowed

14 employees to buy \$50 worth of LBC each week.

10:35 15 Q. When did that program begin?

16 A. I believe it began in the fall of 20

17 -- late summer or fall of 2018.

18 Q. And is that program ongoing?

19 A. I believe there are a couple of

10:35 20 employees at LBRY still in that program.

21 Q. Who was responsible for

22 administering that program?

23 A. Josh Finer.

24 Q. And in total, is -- do you -- is

10:35 25 there an approximate volume of LBC that has been

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10:35 1 sold to that program?

2 A. I believe a little over 1.5 million.

3 Q. And how was the pricing of those

4 sales determined?

10:36 5 A. For most of the program, it's been

6 sold -- the \$50 worth at half the market price.

7 Q. So 50 percent of the market price?

8 A. Yes.

9 Q. And why was the sale pricing

10:36 10 50 percent of the market price?

11 A. It was designed to be a benefit.

12 It's essentially an employee benefit program,

13 among other things.

14 Q. Were there any restrictions imposed

10:36 15 upon the LBRY employees in connection with the

16 purchase of the LBC through that program?

17 A. No. There's no restrictions to what

18 they do with the money that we pay them.

19 Q. Was there any lockup period for those

10:36 20 employees before they could gain access to the

21 LBRY credits?

22 A. No.

23 Q. How would an employee -- sorry.

24 Was it an opt-in program, an employee

10:37 25 would choose to participate in the program?

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10:44 1 part of the employee LBC purchase program, where
2 did that money go?

3 A. Into our bank account.

4 Q. Which bank account?

10:44 5 A. Well, wait. Let me be more specific.

6 We never received money from the
7 employees, so. We were just spending less. It
8 comes out of their paycheck. So my previous
9 answer is incorrect. We're never actually

10:44 10 receiving money. We are just spending less.

11 Q. Did LBRY pay taxes on that transfer
12 of LBC -- or transfer of the \$50?

13 A. Presumably.

14 Q. So it was an offset, a deduction out
10:44 15 of the employee's paycheck.

16 A. I believe so.

17 Q. So the \$50 didn't travel, you know,
18 to the employee's bank account and then back.
19 It just was done through the payroll system?

10:45 20 MR. MILLER: Objection.

21 A. That's my understanding.

22 Q. I'd like to talk about LBRY's
23 decisions to transact LBC through digital asset
24 trading platforms.

10:45 25 What trading platforms did LBRY trade

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10:45 1 LBC in?

2 A. Primarily Bittrex and Poloniex.

3 Q. Any others?

4 A. Possibly, but those were the big two.

10:45 5 Q. What about Hotbit?

6 A. Possibly a small percentage of trades

7 were made there.

8 Q. What about UPbit?

9 A. I don't think with did trading on

10:46 10 UPbit. But it's possible.

11 Q. And just for the record, is Hotbit

12 and UPbit digital asset trading platforms?

13 A. Yes.

14 Q. Did LBRY trade through ShapeShift?

10:46 15 A. I don't believe so.

16 Q. Did LBRY trade on CoinEx?

17 MR. MILLER: Objection.

18 A. I'm not certain.

19 Q. Did LBRY trade LBC on CoinEx?

10:46 20 MR. MILLER: Objection.

21 A. I'm -- I'm not certain.

22 Q. In preparation for today's testimony,

23 did you review LBRY's LBC trading records?

24 A. Some of them.

10:46 25 Q. And in the trading records, was there

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11:01 1 Q. Do you see the column on the second
2 page, where it says, "Is deleted"?

3 A. Yes.

4 Q. And it says, "False," meaning that
11:01 5 the Kauffman account, the LBRY's account in your
6 name has not been deleted.

7 Do you see that?

8 A. Yes.

9 Q. Does that refresh your memory as to
11:01 10 whether or not the account in your name was
11 closed?

12 MR. MILLER: Objection.

13 A. I have -- I don't know the status of
14 the account in my name.

11:01 15 Q. And then the total quantity filled in
16 the far right column on page three for the
17 account in your name, states that approximately
18 3.8 billion LBC was filled in trades on Bittrex.

19 Do you see that?

11:02 20 A. Yes.

21 Q. Does that comport with LBRY records?

22 MR. MILLER: Objection.

23 A. No.

24 Q. What -- what do LBRY records indicate
11:02 25 for the number of trades of LBC -- sorry, the

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11:02 1 number of LBC traded in the LBRY account in your
2 name?

3 A. I -- well, we sold under
4 80 million -- I don't -- I don't know the
11:02 5 specific number for Bittrex. But it -- it -- I
6 don't see why -- the total number of credits
7 sold, you know, is under 80 million, so.

8 Q. You are saying 80 million LBC have
9 been traded by or sold by LBRY into the markets
11:03 10 from the operational fund to date?

11 MR. MILLER: Objection.

12 A. Sorry. Could you repeat the
13 question?

14 Q. Sure.

11:03 15 You tossed out a figure, I think it
16 was around 80 million LBC.

17 Where does that come from?

18 A. The -- the difference between the --
19 the start of the operational fund balance and
11:03 20 the balance today.

21 Q. All right. What is Altonomy?

22 A. Altonomy is a firm in the digital
23 asset space. I'm not sure how they describe
24 themselves.

11:03 25 Q. Did -- LBRY retain Altonomy as a

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11:19 1 Sometimes asked in advance, sometimes not.

2 Q. And was there any criteria that LBRY
3 had developed by at least Q3 2020 when it
4 provided bounties?

11:19 5 A. No formal criteria.

6 Q. And when you say, "give," does that
7 mean that the LBC was transferred from a LBRY
8 wallet to the recipient's wallet?

9 A. Yes.

11:19 10 Q. Were there any restrictions placed on
11 the LBC that was transferred to the recipient's
12 wallet?

13 A. No.

14 Q. Was there any representations that
11:19 15 had to be made by the recipients of the bounty
16 LBC with respect to its receipt of the LBC?

17 A. No.

18 Q. "User engagement," the next line,
19 says, "7,551,200."

11:20 20 Do you see that?

21 A. Yes.

22 Q. All right. What does user engagement
23 mean?

24 A. It means getting users engaged on the
11:20 25 LBRY protocol.

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11:26 1 be used as a support because it's laying fallow
2 otherwise.

3 Q. So these user engagements, this
4 7,551,200 LBC, what were the programs, if any,
11:26 5 by which users were receiving those LBC?

6 A. We had a variety of programs, every
7 new user would get a small amount. Users would
8 receive small amounts as they on-boarded
9 themselves to the protocol. So, you know,
11:27 10 confirm your e-mail address, create a channel,
11 watch your first video. That kind of thing.

12 Q. What about incentive program for
13 content creators during this time?

14 A. I am not certain if that was
11:27 15 something we were doing in -- in -- oh. In --
16 it may also include cryptocurrency sent to
17 YouTubers. That was probably under user
18 engagement at this time.

19 Q. And why was -- or through what
11:27 20 program was LBC sent to YouTubers?

21 A. LBRY had a program where YouTubers
22 would receive cryptocurrency for publishing
23 their content to the network.

24 Q. And would that, again, be a transfer
11:28 25 from a LBRY digital wallet to the content

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11:28 1 creator's digital wallet?

2 A. Yes.

3 Q. Were there any restrictions placed on
4 that transfer?

11:28 5 A. No.

6 Q. Were there any representations made
7 by the recipient in connection with that LBC
8 received?

9 A. No.

11:28 10 Q. Were there any surveys done by LBRY
11 to determine how the recipients were -- what
12 they were doing with the LBC?

13 A. There's no purpose to having LBC
14 other than to use it on the LBRY network.

11:28 15 Q. Right.

16 But the question was, did LBRY do any
17 survey of the recipients of the user engagement
18 LBC to determine what they did with the LBC?

19 MR. MILLER: Objection.

11:28 20 A. No.

21 Q. The community engagement here, it
22 says there was 664,168 LBC utilized.

23 What is community engagement?

24 A. I believe that's -- I believe, but
11:29 25 I'm not certain, that that is sort of ad hoc

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11:32 1 A. Yeah. Whether you were hired you or
2 not.

3 Q. What else would be examples of
4 acquisitions?

11:32 5 A. We would give -- occasionally, give
6 direct payments to a content creator outside of
7 the -- outside of the YouTube program. That
8 would go under acquisition.

9 Q. And would -- did LBRY purchase the
11:32 10 content?

11 A. No.

12 Q. Was it an incentive to have the
13 content creator published to the LBRY network?

14 A. Yes.

11:33 15 Q. Did -- through the acquisition
16 program, did LBRY pay for any publishing fees?

17 A. I'm not certain.

18 Q. The publishing line item, did the LBC
19 go to any individual?

11:33 20 A. I don't believe so.

21 Q. So those were all sort of publishing
22 fees that were paid into the network?

23 MR. MILLER: Objection.

24 A. It's -- so when you publish
11:33 25 something, you also have the ability to stake an

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11:46 1 A. It's -- I like spending less of
2 things. It's part of being fiscally
3 responsible.

4 Q. There's a reference to YouTube
11:47 5 monthly payouts that were to end in Q1 2021.

6 Do you see that?

7 A. Yes.

8 Q. What are those?

9 A. There, at one point in time, was a
11:47 10 program under which YouTubers would receive
11 monthly LBC payments for making their content
12 available via the LBRY protocol.

13 Q. And was that program to phase out in
14 Q1 of 2021?

11:47 15 A. Yes.

16 Q. Did it phase out in Q1 2021?

17 A. Yes.

18 Q. And why was it phased out?

19 A. We wanted -- we -- we felt that it
11:47 20 was not a worthwhile use of resources.

21 Q. Why is that?

22 A. We thought it encouraged some sort of
23 drive by users or we get old -- old channels
24 that weren't really popular. That kind of
11:48 25 thing. It was -- it was a -- it wasn't bringing

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11:48 1 in the right kind of -- of content.

2 Q. You wanted better content and that
3 program wasn't delivering it?

4 A. We felt like it wasn't -- wasn't

11:48 5 worth what we were spending on it, yeah.

6 (Exhibit 171 was marked for
7 identification.)

8 Q. Mr. Kauffman, I'm handing you what's
9 been marked as Exhibit 171. It is a compilation
11:49 10 of pages print out from multiple websites. The
11 first one on the top is entitled "What is LBRY
12 doing with non-mined credits?" And it has a URL
13 of LBRY.com/FAQ/credit-policy.

14 For ease of use, I'll represent to
11:49 15 you that I put these black number pages
16 handwritten in the sort of bottom left-hand
17 corner so we could more easily refer to the
18 various pages.

19 Are you familiar with the first page
11:49 20 of Exhibit 171?

21 A. Yes.

22 Q. Now, I'd like to draw your attention
23 to the middle of the first page where it says,
24 "Community," and the amount is 200 million.

11:50 25 Do you see that?

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12:33 1 Q. And so boost and support are
2 interchangeable?

3 A. When we were using --
4 MR. MILLER: Objection.

12:33 5 A. When we were using the word boost, we
6 were using that as a synonym for support. I
7 don't think we used it for very long.

8 Q. In terms of Exhibit 160 -- never
9 mind.

12:34 10 Has -- has a stake ever been referred
11 to as a deposit by LBRY?

12 A. Not -- not to my recollection.
13 May -- maybe.

14 Q. Has deposit been used in any other
12:34 15 way by LBRY other than as a stake?

16 MR. MILLER: Objection.

17 A. I don't think so.

18 Q. So -- and perhaps 169 could be your
19 guide, but can you identify any programs,
12:34 20 incentive programs or efforts that LBRY has
21 engaged in to incentivize using the network, the
22 LBRY network that did not involve the transfer
23 of LBC to the user?

24 MR. MILLER: Objection.

12:35 25 A. Any -- if I'm understanding the

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12:35 1 question correctly, that would include
2 practically everything we do. Purpose of our
3 website is to encourage people to use the LBRY
4 network. Purpose of me going on the podcast, is
12:35 5 for the purpose of encouraging people to use the
6 LBRY network.

7 Q. So has LBRY transferred LBC to a
8 third party to encourage the usage of a network
9 but the transfer is not to the user itself, or
12:35 10 themselves?

11 A. Occasionally, we would give chunks to
12 another community. So if you give a chunk to a
13 sub-Reddit or a moderator of some Discord chat
14 or things like that.

12:36 15 Q. Were there any restrictions on what
16 the recipient could do with the LBC it received
17 in that context?

18 A. They -- in those cases, the recipient
19 would be passing it on to others.

12:36 20 Q. Was that required as part of the
21 transfer to that recipient?

22 A. It was -- there was an understanding.

23 Q. I mean, I'll be -- try to be as
24 candid and blunt as -- I'm trying to identify if
12:36 25 there was a point in time when LBRY was -- was

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12:41 1 MR. MILLER: Objection.

2 A. It's -- it's something that I would
3 ask Josh from time to time.

4 Q. Josh Finer?

12:41 5 A. Yes.

6 Q. Did he keep any notes of his
7 observations?

8 A. I'm not certain.

9 Q. If LBRY wanted to track the LBC it
12:41 10 sold through MoonPay application, could it have
11 done so?

12 MR. MILLER: Objection. Speculative.

13 A. It would be difficult to do so.

14 Q. Was it feasible?

12:42 15 MR. MILLER: Objection. Speculative.

16 A. It's -- it's a very complicated
17 question.

18 Q. What's complicated about the
19 question?

12:42 20 MR. MILLER: Objection.

21 A. It's -- as -- as you've seen, you can
22 track the movements from address to address.
23 But it's difficult to ascertain what that means
24 or it can mean.

12:42 25 Q. If an LBC is used for publishing and

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12:42 1 paying for a claim, that's noted on the LBRY
2 blockchain, correct?

3 A. Yes.

4 Q. I'd like to change topics and talk
12:43 5 about the listing of LBC on any digital asset
6 trading platform.

7 MR. MILLER: Do you want to take a
8 break now? It's a quarter of.

9 MR. MOORES: I was hoping to run
12:43 10 until shortly before 1 o'clock.

11 MR. JONES: We've only been going for
12 about 11 minutes since the last break.

13 MR. MILLER: Okay. I'll let Rachel
14 represent the witness now. Until -- okay? I'm
12:43 15 just going to excuse me myself for -- until the
16 end of lunch. Rachel Mechanic will take over.

17 BY MR. MOORES:

18 Q. What, if anything, did LBRY do to get
19 listed on the exchange MXC?

12:43 20 A. I'm not certain.

21 Q. What did LBRY do, if anything, to get
22 listed on the exchange BitMart?

23 A. I'm not -- I'm not certain.

24 Q. What did LBRY do, if anything, to get
12:44 25 listed on the LBank exchange?

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12:50 1 form and they make a decision.

2 Q. Did LBRY ever pay to be listed on any
3 exchange?

4 A. Occasionally.

12:50 5 Q. Which exchanges did it pay to be
6 listed on?

7 A. I don't recall specifically. For a
8 long time, our policy was not to pay at all.
9 And we later amended that to allow small

12:50 10 payments on the order of maybe \$10,000.

11 Q. When did LBRY amend its policy to
12 include payments to exchanges to be listed?

13 A. Sometime in 2020 or 2021.

14 Q. I'd like to talk about some of the
12:51 15 duties and responsibilities of members of the
16 LBRY team. You've testified a little bit about
17 what some of Josh -- Joshua Finer's duties and
18 responsibilities are today.

19 Can you identify any other duties and
12:51 20 responsibilities that he was responsible for?

21 MS. MECHANIC: Objection.

22 A. Josh was a -- he was sort of a
23 jack-of-all-trades. So he would help out with
24 all kind of things. But his biggest
12:52 25 responsibilities were finances, exchange

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01:48 1 this fact article is fairly old and hasn't been
2 updated or reread by anyone in several years.

3 Q. So if I can direct your attention
4 back to Exhibit number 21. The answers to the
01:48 5 big questions from a Reddit AMA. There's -- on
6 the third page of the exhibit, it says, "How
7 does the company behind LBRY make money?"

8 Do you see that?

9 A. Yes.

01:49 10 Q. And it says in this posting from
11 September of 2016, "LBRY, Inc. has reserved
12 ten percent of all LBRY credits to fund
13 continued development and provide profit for the
14 founders. Since credits only gain value as the
01:49 15 use of the protocol grows, the company has an
16 incentive to continue growing this open source
17 project. And can do it all without taking a
18 percentage of anyone's transactions."

19 Does Exhibit 21 refresh your
01:49 20 recollection as to when the language I quoted
21 previously was added to Exhibit 173?

22 A. That seems like --

23 MS. MECHANIC: Same objection.

24 A. Yeah. I mean, it seems -- since it
01:49 25 appears to match, it seems likely that this was

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01:49 1 written sometime in September of 2016.
2 MS. MECHANIC: Jeremy, give me a --
3 pause for a sec --
4 THE WITNESS: Yeah.
01:50 5 MS. MECHANIC: -- so I can get in an
6 objection if you can.
7 Q. And back in Exhibit 173, under the
8 bullet where it says, "This is not a
9 pump-and-dump scheme or vaporware." There's a
01:50 10 line that says, "Our goal is to increase the
11 long-term value of the protocol. Which if
12 adopted globally, will make our reserve many
13 times more valuable than any short-term bubble.
14 We are patient and focused on the future
01:50 15 period."
16 Do you see that?
17 A. Yes.
18 Q. When was that language first included
19 in LBRY's FAQ?
01:50 20 MS. MECHANIC: Same objection.
21 A. I suspect this post was written in
22 September of 2016 and never updated.
23 Q. When was the last time that -- sorry.
24 Who at LBRY has edited the how does
01:51 25 the company behind LBRY make money FAQ?

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01:51 1 MS. MECHANIC: Same objection. If
2 you were going to spend this many questions on
3 this post, I'm not sure why it's not included in
4 your topic. So are we almost finished with this
01:51 5 post?

6 MR. MOORES: We are. I just --

7 A. I don't -- I don't know who's
8 edited this -- who edited or wrote this.

9 Q. There's a -- a line at the bottom of
01:51 10 Exhibit 173 which refers to GitHub.

11 Do you see that?

12 A. Yes.

13 Q. Would -- when or if this post had
14 ever been edited, would that be reflected on
01:51 15 GitHub?

16 MS. MECHANIC: Same objection.

17 A. Yes.

18 Q. Mr. Kauffman, I'd like to -- I'd like
19 to talk about a number of individuals. First,
01:52 20 Naomi Brockwell -- the five I just need to talk
21 about are Naomi Brockwell, John Dorval, David
22 Jones, Macavei Raul, and Aaron Watson.

23 Have you heard of those five
24 individuals?

01:52 25 A. Yes.

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02:17 1 MS. MECHANIC: Objection.

2 A. I don't -- I don't believe we did
3 anything.

4 Q. What efforts did LBRY undertake to
02:17 5 identify content creators to join the LBRY
6 network?

7 MS. MECHANIC: Objection.

8 A. A variety of efforts.

9 Q. Please describe those efforts.

02:17 10 A. We would look at publicly available
11 reports and data around the performance of video
12 content creators.

13 Q. Data from what platform?

14 A. Social Blade would be one. Or other
02:18 15 aggregators of that kind of information.

16 Q. And were the content creators already
17 publishing to some platform?

18 A. Frequently.

19 Q. And what platforms would they be
02:18 20 publishing to that were captured by the company
21 that provided those data?

22 A. Typically, frequently YouTube. But
23 it could also be that they were publishing to
24 TikTok or Twitter or something else.

02:18 25 Q. And what, if anything, did LBRY do

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02:18 1 with that data?

2 A. I believe sometimes perform outreach
3 directly to creators to see if they would be
4 interested.

02:18 5 Q. How would LBRY perform that outreach?

6 A. Typically via e-mail.

7 Q. How would LBRY get those e-mail
8 addresses?

9 A. They're frequently publicly
02:18 10 available.

11 Q. What was the purpose of reaching out
12 to those content creators?

13 A. To spread awareness of LBRY and to
14 encourage them to publish and share their
02:19 15 content in a way that's better.

16 Q. During those reach out efforts, did
17 you -- sorry.

18 Did LBRY invite the content creators
19 to participate in the YouTube Sync program?

02:19 20 A. Sometimes.

21 Q. Why would LBRY not invite the content
22 creators to participate in the YouTube Sync
23 program?

24 MS. MECHANIC: Objection.

02:19 25 A. I don't know that anyone was ever

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02:51 1 Q. All right. And the spending of that
2 money came from LBRY's bank account, correct?

3 A. Yes.

4 Q. And prior to the web versions of
02:51 5 LBRY's applications being created, did LBRY
6 mirror contents on the LBRY network?

7 A. I'm not certain.

8 Q. Mr. Kauffman, I'd like to draw your
9 attention to Exhibit 172. Which should be in
02:51 10 the pile in front of you.

11 This talks about keeping your eye on
12 the LBRY road map.

13 What is the LBRY road map?

14 A. The LBRY road map was a web page that
02:52 15 people could visit to get information about a
16 past and future changes.

17 Q. Why did LBRY create LBRY road map?

18 A. To communicate information to the
19 public about past and future changes.

02:52 20 (Exhibit 175 was marked for
21 identification.)

22 (Exhibit 176 was marked for
23 identification.)

24 Q. Mr. Kauffman, I'm handing you what
02:53 25 has been marked as Exhibits 175 and 176. 175 is

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02:53 1 entitled "LBRY road map. Future plans for the
2 journey into the a land of dragons." And at the
3 bottom, it has the URL of this printout from the
4 website. And it is LBRY.com/roadmap/2019.

02:53 5 Exhibit 176 says, "LBRY road map.
6 Future plans for the journey into the land of
7 dragons." There's a 2020 in the box towards the
8 top. And the URL on the bottom is
9 LBRY.com/roadmap/2020.

02:54 10 Do you have Exhibits 175 and 176 in
11 front of you?

12 A. Yes.

13 Q. And looking just at Exhibit 175, is
14 that an example of the -- of a LBRY road map?

02:54 15 A. This was a road map that we published
16 in probably the beginning of 2019.

17 Q. Did LBRY develop road maps for each
18 year until at least 2020?

19 A. I believe we did this for two or
02:54 20 three years and then stopped.

21 Q. Excuse me.

22 Who at LBRY was involved in creating
23 the 2019 LBRY road map?

24 A. Almost -- everyone in the -- everyone
02:54 25 in the company was invited to participate in the